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July 14, 2025

By ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Street
New York, New York 10007

Re: *United States v. Joshua Adam Schulte*, 17-cr-548 (JMF)

Dear Judge Furman,

We write concerning the Final Order of Forfeiture the Court issued in the above-caption case as to *pro se* defendant Joshua A. Schulte on June 18, 2025. ECF 1154. Sabrina Shroff was appointed to represent Mr. Schulte in the Southern District of New York and has been appointed co-counsel, along with Megan Bennett, in the Second Circuit Court of Appeals for purposes of Mr. Schulte's appeal.

Upon Mr. Schulte's receipt of the Final Order from the Clerk of the Court, we expect that he may move for reconsideration, and we further anticipate that the forfeiture issues will be a subject of the pending appeal. It is our understanding that some of the items that are listed on the Court's Final Order of Forfeiture may contain data or information relevant to Mr. Schulte's appeal, as well as being the topic of any appeal of the forfeiture proceedings generally.

We therefore respectfully ask the Court to issue a stay of the Final Order pending appeal pursuant to Fed.R.Crim.P. 32.2(d), which is necessary to ensure that the property remains available pending appellate review. Given that no third-party has asserted an interest in the subject property and there are no ancillary proceedings concerning that property, a stay will not prejudice anyone.

Respectfully submitted,

/s/ Sabrina P. Shroff

/s/ Megan W. Bennett